

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

United States of America,

Plaintiff,

vs.

Sarahi Santos,

Defendant.

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§
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§

Civil Action M-18-171
(CDCS: 2017A64333)

Complaint

1. *Jurisdiction.* The district court has jurisdiction because the United States is a party. *See* U.S. CONST., art III, § 2, and 28 U.S.C. § 1345.
2. *Venue.* The defendant resides in Hidalgo County, Texas, and may be served with process at 2928 Hibiscus St., Roma, Texas 78584.
3. *The Debt.* The debt owed to the United States arose through hospital expenses at Brook Army Medical Center, Ft. Sam Houston, Texas. See Exhibit A. The debt on the date of the Certificate of Indebtedness, Exhibit B, was:

A.	Current principal	\$	13,857.93
B.	Interest (capitalized and accrued through 11/03/16)	\$	244.51
C.	Administrative fees, costs, penalties (Including \$400.00 Filing fee)	\$	7,183.97
D.	Balance due	\$	<u>21,286.41</u>
E.	Prejudgment interest accrues at 1.00% per annum being \$0.38 per day.		
F.	The current principal in paragraph 3 A is after credits of \$0.00.		

4. *Default.* The United States has demanded that the defendant pay the indebtedness, and the defendant has failed to pay it.
5. *Prayer.* The United States prays for judgment for:
 - A. The sums in paragraph 3, pre-judgment interest, administrative costs, and post-judgment interest; and,
 - B. Other relief the court deems proper.

Respectfully submitted,

CERSONSKY, ROSEN & GARCÍA, P.C.

By: 

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Attorneys for Plaintiff

BROOKE AMC FT SAM HOUSTON TX

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BAMC MCHE COU-T DEPT 201
3551 ROGER BROOKE DRIVE
FT SAM HOUSTON TX 78234-6200DEPARTMENT OF THE ARMY
HOSPITAL INVOICE AND RECEIPTSPONSOR NAME: SANTOS, SARAHI
DUTY ADDRESS:SERVICE: BRANCH OF SV
GRADE:BILLING NAME: SANTOS, SARAHI
BILL ADDRESS: 2928 HIBISCUS ST.
ROMA TX 78584

FMP/SSN: 98/805-13-5971

PATIENT NAME: SANTOS, SARAHI
ADM: 23 May 2013@0233 DISCH: 29 May 2013@1508 ACCOUNT NO: 5224286
TOTAL CHARGES: \$13857.93

----- CHARGES -----

INPATIENT CHARGES:

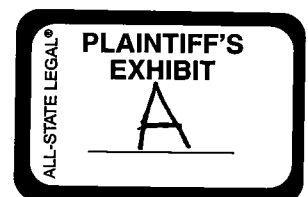
BEG DATE	END DATE	CHG DAYS	NCHG DAYS	RATE	CHARGE
23 May 2013	29 May 2013	6	0	2309.66	13857.93

----- INVOICES & RECEIPTS -----

DATE	PAYMENT	TYPE PAY	CHECK NO.	CTRL NO.	BALANCE
01 Jun 2013	0.00			13-43593	13857.93
23 Jun 2017	0.00			17-37402	0.00*

* Recalculated charges

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ACCOUNT NO: 5224286

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DISCH: 29 May 2013@1508

TOTAL CHARGES: \$13857.93



U.S. DEPARTMENT OF THE TREASURY
BUREAU OF THE FISCAL SERVICE
WASHINGTON, D.C. 20227

ACTING ON BEHALF OF
Department of Defense, U.S. Army Medical Command,
Brooke Army Medical Center (BAMC)
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and Address(es):

Sarahi Santos
2928 Hibiscus St
Roma, TX 78584

The debtor named above is indebted to the United States in the amount stated as follows:

Principal:	\$ 13,857.93
Interest through 11/03/16:	\$ 244.51
Admin fees:	\$ 15.00
Penalty Charges:	\$ 1,467.04
DMS fees:	\$ 4,675.34
DOJ fees:	\$ 626.59

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), (7); 31 C.F.R. 285.12(j) and 31 C.F.R. 901.1(f); and 28 U.S.C. 527, note)

TOTAL debt owed as of 11/03/16: \$ 20,886.41

CERTIFICATION: Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the Department of Defense, U.S. Army Medical Command, Brooke Army Medical Center (BAMC).

Date: 11/03/2016

Ashleigh Edmonds

Ashleigh Edmonds
Financial Program Specialist
U.S. Department of the Treasury
Bureau of Fiscal Service

